



MARSHALL • SUZUKI LAW GROUP, LLP

230 California Street, Suite 415

San Francisco, CA 94111

Tel • 415 • 618 • 0090

Fax • 415 • 618 • 0190

Junji Suzuki

junji@marshallsuzuki.com

April 6, 2022

Via Email

FC2 Abuse
FC2, Inc
4730 S. Fort Apache Rd. Suite 300
Las Vegas, NV 89147
Phone: 4242366050
Email: abuse@fc2.com

RE: NOTIFICATION OF COPYRIGHT INFRINGEMENT
(Pursuant to 17 U.S.C. § 512)
Infringing Website: <https://adult.contents.fc2.com/>

To Whom It May Concern:

This law office represents SOFT ON DEMAND Company, Limited, a Japanese corporation (hereinafter called “SOD”), in connection with SOD’s copyright infringement claims against you. Please note that this is a legal notice, providing you with the outline of SOD’s potential federal claims arising out of the following facts.

It has recently come to SOD’s attention that you and your customer has continuously and unlawfully published and introduced to the market certain copyrighted work listed under the column entitled “Original Work” in Exhibit A attached hereto (“Exhibit A”), solely owned by SOD (referred to as the “SOD Work” or “Original Work”). The URLs of the videos infringing the exclusive right of SOD are also identified and listed under the column entitled “Infringing Work” in Exhibit A (referred to as the “Infringing Work”).

Please also note that to be eligible for safe harbor protection under 17 U.S.C. § 512, a service provider is required to adopt and reasonably *implement* a repeat infringer policy under 17 U.S.C. § 512 (i). Failure to do so will disqualify a service provider from a safe harbor protection and SOD intends to seek any remedies available by law. Furthermore, a service provider under 17 U.S.C. § 512 (c) could still be held liable even without actual knowledge of infringement, if it is “aware of facts or circumstances from which infringing activity is apparent,” so-called “red flag” knowledge.

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You/your customer have been advertising, distributing, and selling the Infringing Work, which is materially identical to the SOD Work, through the website located at the aforementioned URL. It is clear that your customer has used the SOD Work without SOD's permission, and that your conduct infringes SOD's exclusive right. Thus, SOD has a good faith belief that use of the material in the manner complained of is not authorized by SOD, its agent, or the law. Any further copying, reproduction, importation, advertising, marketing, distribution, or sale of the Infringing Work after your receipt of this letter will be willful, giving rise to exposure for aggravated damages.

On behalf of SOD, we demand that you immediately disable access to the SOD Work and cease any use, reproduction, and distribution of the SOD Work and that you provide us with a written assurance that you will:

- (a) permanently cease and desist from further use of the SOD Work;
- (b) permanently cease and desist from further advertising, marketing, distribution, and sale of the SOD Work;
- (c) remove or disable access to the Infringing Work and so confirm to us in writing;
- (d) delete from your website the advertisement that you/your customer sell the Infringing Work;
- (e) display on your website for three months the statement that (i) the owner of the exclusive right of the SOD Work is SOD, and (ii) you/your customer have been selling the Infringing Work without SOD's permission.

We also demand a written assurance that your customer will fully account to us with regard to advertising, marketing, purchasing, sales, and profits of the Infringing Works.

I declare that the information in this notice is accurate, and under penalty of perjury, that this office is authorized to act on behalf of SOD, the owner of the exclusive right of the SOD Work.

Your immediate response will be appreciated.

Very truly yours,

MARSHALL SUZUKI LAW GROUP, LLP



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Attorney at Law
230 California Street, Suite 415
San Francisco, CA 94111
(Tel) 415-618-0090
(Fax) 415-618-0190
(Email) junji@marshallsuzuki.com

CC: Client

Exhibit A

No	Original Work	Infringing Work
1	https://ec.sod.co.jp/prime/videos/?id=STARS-160	https://adult.contents.fc2.com/article/2676848/
2	https://ec.sod.co.jp/prime/videos/?id=STARS-134	https://adult.contents.fc2.com/article/2644554/
3	https://ec.sod.co.jp/prime/videos/?id=STKO-003	https://adult.contents.fc2.com/article/2649995/
4	https://ec.sod.co.jp/prime/videos/?id=SDJS-066	https://adult.contents.fc2.com/article/2642525/
5	https://ec.sod.co.jp/prime/videos/?id=STARS-199 https://ec.sod.co.jp/prime/videos/?id=STARS-140	https://adult.contents.fc2.com/article/2681095/
6	https://ec.sod.co.jp/prime/videos/?id=SDDE-578	https://adult.contents.fc2.com/article/2687302/
7	https://ec.sod.co.jp/prime/videos/?id=STARS-250 https://ec.sod.co.jp/prime/videos/?id=STARS-238 https://ec.sod.co.jp/prime/videos/?id=STARS-252	https://adult.contents.fc2.com/article/2685618/
8	https://ec.sod.co.jp/prime/videos/?id=STARS-043 https://ec.sod.co.jp/prime/videos/?id=STARS-080	https://adult.contents.fc2.com/article/2685619/
9	https://ec.sod.co.jp/prime/videos/?id=STARS-160 https://ec.sod.co.jp/prime/videos/?id=SDDE-598 https://ec.sod.co.jp/prime/videos/?id=SDJS-028 https://ec.sod.co.jp/prime/videos/?id=SDAM-046 https://ec.sod.co.jp/prime/videos/?id=SDDE-578	https://adult.contents.fc2.com/article/2675488/
10	https://ec.sod.co.jp/prime/videos/?id=STARS-152 https://ec.sod.co.jp/prime/videos/?id=STARS-168 https://ec.sod.co.jp/prime/videos/?id=STARS-182 https://ec.sod.co.jp/prime/videos/?id=STARS-225	https://adult.contents.fc2.com/article/2679815/
11	https://ec.sod.co.jp/prime/videos/?id=STARS-160	https://adult.contents.fc2.com/article/2659922/
12	https://ec.sod.co.jp/prime/videos/?id=SDMU-963	https://adult.contents.fc2.com/article/2715521/
13	https://ec.sod.co.jp/prime/videos/?id=SDDE-617	https://adult.contents.fc2.com/article/2715520/
14	https://ec.sod.co.jp/prime/videos/?id=STARS-081	https://adult.contents.fc2.com/article/2646733/